

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GIDEON RAPAPORT,

Plaintiff,

v.

RICHARD ALLEN EPSTEIN, et al.,

Defendants.

Case No.: 24-cv-7439-JGLC

**DEFENDANT MITCHELL K. PALLAKI'S MOTION TO DISMISS**

Pursuant to Federal Rules of Civil Procedure 9(b) and 12(b)(6), and upon the accompanying Memorandum of Law, Defendant Mitchell K. Pallaki hereby moves for an order dismissing the Complaint with prejudice and granting other further relief as the Court may deem just and proper.

Dated: New York, New York  
February 13, 2025

Respectfully submitted,

By: /s/ Seth L. Levine  
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Steven W. Kessler

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